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# ***OAR Box 1192***

*Prepped by Candice Davis*

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***Document Number:***

**162) IV-D-15**

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***Docket Number:***

**A-90-16**

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IV-D-15

# TOTAL

Total Petroleum, Inc.

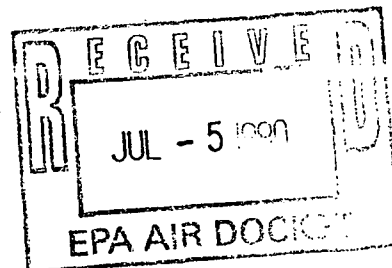
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JAMES H. MCCOY  
VICE PRESIDENT  
REFINING OPERATIONS

June 26, 1990



Air Docket (LE-131) of EPA  
Room M-1500  
401 M Street, S.W.  
Washington, D.C. 20460

Dear Sirs:

TOTAL PETROLEUM, INC. wishes to register its support for the ETHYL CORPORATION, HiTEC-3000 fuel additive waiver application filed with the U.S. Environmental Protection Agency.

TOTAL PETROLEUM, INC. supports the efforts of the U.S. EPA in reducing air emissions and believes that fuel additives such as Ethyl's HiTEC-3000 represent an effective method in reducing overall air emissions. Unlike some alternatives, the effect of this additive would be immediate since it could be added to gasoline, at the refineries, within a very short time of EPA approval.

As a refiner, the use of the Ethyl HiTEC-3000 additive in gasoline blending reduces the severity of the overall refining process for any given gasoline octane value. First, the use of the HiTEC-3000 will reduce the severity in the naphtha reforming process. This reduction in reforming severity reduces the fuel burned in the reforming process thereby reducing emissions. Because of the nature of the reforming reactions, the reduction in reformer severity also means that less crude oil has to be processed for a given quantity of gasoline. This has a multiplying effect in that all of the processes upstream of the reformer would treat less crude oil, feedstocks, etc. and thereby burn less fuel and contribute less emissions.

TOTAL PETROLEUM, INC. is a refiner and marketer in the Central U.S. and has oil and gas exploration in Western Canada. The company operates from refineries having a combined capacity of 190,000 barrels of crude oil per day in Alma, Michigan; Ardmore, Oklahoma; Arkansas City, Kansas and; Denver, Colorado. The company markets petroleum products in 22 states under the brand names of APCO, ROAD RUNNER, TOTAL and VICKERS.

Sincerely,

James H. McCoy

JHM:as